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10 GOOGLE LLC

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION
14

15 GOOGLE LLC,
16
17 Plaintiff,
18 v.
19 NCHE NOEL NTSE,
20 Defendant.

Case No. 5:22-cv-02244-EJD

**[PROPOSED] ORDER GRANTING GOOGLE
LLC'S MOTION FOR DEFAULT JUDGMENT
AGAINST DEFENDANT NCHE NOEL NTSE**

1 The Court orders as follows:

2 1. Plaintiff's motion for default judgment is GRANTED.

3 2. Defendant is liable for breach of contract under California law.

4 3. Defendant and Defendant's officers, agents, servants, employees, attorneys,
5 successors, and assigns, and all other persons who are in active concert with or participation with
6 any of them or who are affiliated with Defendant are hereby permanently enjoined from the
7 following:

8 a. Accessing or attempting to access Google's services;

9 b. Creating or maintaining any Google accounts;

10 c. Engaging in any activity (or facilitating others to engage in any activity) that
11 violates Google's Terms of Service or related policies;

12 d. Continuing to operate the websites listed in Exhibit 5 of Plaintiff's
13 complaint; and

14 e. Creating, operating, or facilitating any fraudulent schemes or websites
15 utilizing Google's services or any other third-party platforms.

16 4. This Court shall retain jurisdiction for the purpose of making any further orders to
17 construe, modify, or enforce this judgment.

18 **IT IS SO ORDERED.**

19
20 Dated: _____, 2022

By: _____
Hon. Edward J. Davila
U.S. DISTRICT JUDGE